

THE TOWNSHIP OF EWING

Municipal Complex
2 Jake Garzio Drive
Ewing, NJ 08628



Phone: (609) 883-2900
Admin. Fax: (609) 538-0729
Clerk Fax: (609) 771-0480
Web Address: www.ewingnj.org

August 10, 2020

VIA EMAIL

Taeho Kim

(opra+request-12452-b95325d7@requests.opramachine.com)

Re: Open Public Records Act Request

Dear Mr. Kim:

Ewing Township (the "Township") received your Open Public Records Act (OPRA) request on May 27, 2020. On August 7, 2020, the Township responded to your OPRA request, but reserved its right to supplement its response at a later date.

Upon further review of its records, subject to and without waiving any objections previously raised, the Township is further providing you with the below list and any related complaints based on its good faith review of its records:

Case Caption	Docket No.
McClendon v. Ewing Township	3:11-cv-06163
Freeman v. Ewing Township Police Department, et al.	3:12-cv-01366
Freeman v. Trenton Police Department, et al.	MER-L-0515-19

Your OPRA request is now deemed complete. If you should have any questions or need additional assistance, please do not hesitate to contact this office at (609) 538-7609.

Sincerely,

Kim J. Macellaro, CMC
Ewing Municipal Clerk

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

**MARVIN MCLENDON
41 NORTHAMPTON DRIVE
EWING, NJ 08046**

VS.

**EWING TOWNSHIP
2 JAKE GARZIO DRIVE
EWING, NJ 08628**

**: CIVIL ACTION
:
:
:
: NO.
:
:
:
: JURY TRIAL DEMANDED
:**

COMPLAINT

1. Plaintiff, Marvin McLendon is adult individual and citizen and resident of the State of New Jersey, residing at the above-captioned address.

2. Defendant, Ewing Township is a duly constituted municipal authority with offices located at the above-captioned address.

3. Jurisdiction is based on 28 U.S.C. §1331; the action arises under the Constitution, laws, or treaties of the United States.

4. Venue is properly laid in this District pursuant to 28 U.S.C. §1391(b).

5. At all times material hereto, the defendant, acted by and through its agents, servants, workmen and/or employees, acting within the course and scope of their employment of same within its control and/or right to control.

6. On or about August 10, 2011, in the area of 1535 Pennington Road, Ewing, NJ 08618, the plaintiff was stopped by Ewing Township police officers, when suddenly and without

warning, he was violently beaten, assaulted, struck and accosted by said officers. As a result of the aforementioned conduct, the plaintiff sustained serious and permanent injuries and damages set forth more fully herein at length.

7. The police officers' actions constitute a substantive due process violation, excessive use of force, false imprisonment and false arrest in violation of the Fourth and Fourteenth Amendments of the United States Constitution.

8. Plaintiff's injuries were the result of the officers' direct violation of plaintiff's constitutional rights.

9. The officers' treatment of plaintiff was without provocation and unreasonable, and was as a direct result of Ewing Township's custom, policy, and practice.

10. As the direct and proximate result of Ewing Township custom, practice and policy and the aforesaid unlawful and malicious physical abuse of plaintiff by the officers, each of them committed under color of state law under authority as a Ewing Township police officer, plaintiff sustained grievous bodily harm and was deprived of his right to be secure in his person, against unreasonable seizure of his person and the use of excessive force, in violation of the Fourth and Fourteenth Amendments to the Constitution of the United States and 42 U.S.C. §1983.

11. As the direct and proximate result of Ewing Township custom, practice and policy and the aforesaid unlawful and malicious physical abuse of plaintiff by the officers, plaintiff suffered severe and permanent injuries and damages including, but not limited to, a fractured jaw, contusions, abrasions, severe post-concussion syndrome, severe post-traumatic stress, severe bruising throughout his body, several lacerations on his face, scarring, disfigurement, embarrassment and humiliation, loss of life pleasures and bodily functions, as well as multiple other injuries, causing plaintiff great pain, anguish, fear and consternation. Additionally, plaintiff

has suffered special damages in the form of medical expenses, lost wages, diminished future earning capacity, and will suffer additional special damages in the future in amounts which have not yet been determined.

WHEREFORE, plaintiff, Marvin McLendon, demands punitive and compensatory damages against the Defendant, individually, jointly and severally, in an amount in excess of One Hundred Thousand Dollars (\$100,000.00) plus costs, interest, and delay damages, together with such punitive and exemplary damages and legal fees as the court shall allow.

JURY TRIAL DEMAND

Plaintiff demands a trial by jury on all claims.

Respectfully Submitted,

SWARTZ CULLETON PC

//Christopher Culleton

By: Christopher J. Culleton
133 North State Street
Newtown, PA 18940
215-550-6553
215 550 6557 (Fax)

Dated: October 18, 2011

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

CIVIL ACTION

PORTIA FREEMAN

Plaintiff,

Civil Action No. _____

Vs.

EWING TOWNSHIP POLICE DEPARTMENT,
POLICE OFFICER JEFFREY CALDWELL #129,
POLICE OFFICER CHRISTOPHER BOLLER #185,
POLICE OFFICER JEFFREY GALANT #180,
SERGEANT KARL BARTOWSKI #130,
POLICE OFFICER MORRIS #172,
POLICE OFFICER TETTEMER #175;
TOWNSHIP OF EWING, *Mayor Jack Ball*

Defendants.

RECEIVED

MAR 05 2012

AT 8:30 _____ M
WILLIAM T. WALSH
CLERK

NATURE OF ACTION AND JURISDICTION

1. This is a civil action for damages brought pursuant to the United States Constitution and 42 U.S.C. 1983 resulting from deprivations, under color of law, of the plaintiffs' rights under the Fourth, Fifth, Sixth and Eight Amendments to the United States Constitution.
2. This Court has jurisdiction over these claims pursuant to Article III, Section 1 of the United States Constitution and 28 U.S.C. §§ 1331, 1332, and 1343. This Court also has pendant jurisdiction to decide the intentional tort claims against the individual police officer defendants. The amount in controversy exceeds \$10,000 excluding interest and costs.
3. A timely notice of claim was filed with the defendant Township of Ewing.
4. Venue is properly established in this judicial district pursuant to 28 U.S.C. § 1391 (B).
5. Defendant 6, Sergeant Bartowski *Failed to Intervene* pursuant to defendants 3, 4, 5, and 7, attempting to arrest plaintiff. Plaintiff claims arresting officer(s) lacked probable cause as she had not committed a crime to justify seizure.
6. Plaintiff claims civil right violated under ADA Title II.

Title II of the ADA, which applies to state prisons, provides, “[N]o qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity.” 42 U.S.C. § 12132; *see also Pennsylvania Dep’t of Corr. v. Yeskey*, 524 U.S. 206, 210, 118 S.Ct. 1952 (1998). “Federal regulations implementing Title II require public entities to „make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless the public entity can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity.□”

7. It is plaintiffs’ claim that defendants 1-7 discriminated against plaintiff by failing to recognize the existence of her disability which would have then required special accommodations during apprehension and while imprisoned at Ewing Township police Department and Mercer County Workhouse in Lambertton NJ. Therefore, as the defendants were aware of plaintiffs’ disability, but denied use of defendants programs to accommodate disabled individual, and denied the programs because of defendants disability as recognition of condition would have required providing proper guidelines to police officers of appropriate procedure or programs in place to handle disabled person, but as defendants failed to acknowledge plaintiff’s disability defendants failed to adhere to ADA Regulations.

PARTIES

PLAINTIFF

8. Portia Freeman is a citizen of the United States and a resident of Trenton NJ.

DEFENDANTS

9. Ewing Township Police Department, 2 Jake Garzio Drive Ewing NJ 08638, was at all times relevant to this lawsuit a governmental entity subject to suit, and was responsible for creating and implementing policies and practices that violated the federal and common law rights of the plaintiff.
10. Police Officer Jeffrey Caldwell #129, 2 Jake Garzio Drive Ewing NJ 08638, was at all times relevant to this lawsuit a police officer with the Ewing Township Police Department. The acts of Caldwell, which are subject of this lawsuit, were outside the scope of his employment and

constituted criminal, fraudulent, willful and malicious conduct. Upon information and belief, Caldwell is a citizen of the United States and a resident of the State of New Jersey.

11. Police Officer Christopher Boller #185, 2 Jake Garzio Drive Ewing NJ 08638, was at all times relevant to this lawsuit a police officer with the Ewing Township Police Department. The acts of Boller, which are subject of this lawsuit, were outside the scope of his employment and constituted criminal, fraudulent, willful and malicious conduct. Upon information and belief, Caldwell is a citizen of the United States and a resident of the State of New Jersey.
12. Police Officer Jeffrey Galant #180, 2 Jake Garzio Drive Ewing NJ 08638, was at all times relevant to this lawsuit a police officer with the Ewing Township Police Department. The acts of Galant which are subject of this lawsuit, were outside the scope of his employment and constituted criminal, fraudulent, willful and malicious conduct. Upon information and belief, Caldwell is a citizen of the United States and a resident of the State of New Jersey.
13. Police Officer Sergeant Karl Bartowski #130, 2 Jake Garzio Drive Ewing NJ 08638, sergeant in charge at said time and place, was at all times relevant to this lawsuit a police officer with the Ewing Township Police Department. The acts of Bartowski, which are subject of this lawsuit, were outside the scope of his employment and constituted criminal, fraudulent, willful and malicious conduct. Upon information and belief, Caldwell is a citizen of the United States and a resident of the State of New Jersey.
14. Police Officer Morris # 172, 2 Jake Garzio Drive Ewing NJ 08638, was at all times relevant to this lawsuit a police officer with the Ewing Township Police Department. The acts of Morris, which are subject of this lawsuit, were outside the scope of his employment and constituted criminal, fraudulent, willful and malicious conduct. Upon information and belief, Caldwell is a citizen of the United States and a resident of the State of New Jersey.
15. Police Officer Tettemer #175, 2 Jake Garzio Drive Ewing NJ 08638, was at all times relevant to this lawsuit a police officer with the Ewing Township Police Department. The acts of Tettemer, which are subject of this lawsuit, were outside the scope of his employment and constituted criminal, fraudulent, willful and malicious conduct. Upon information and belief, Caldwell is a citizen of the United States and a resident of the State of New Jersey.
16. The Township of Ewing, 2 Jake Garzio Drive Ewing NJ 08638, was at all times relevant to this lawsuit a governmental entity subject to suit, and was responsible for creating and implementing policies and practices that violated the federal and common law rights of the plaintiff.

Title II of the ADA, which applies to state prisons, provides, “[N]o qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity.” 42 U.S.C. § 12132; *see also Pennsylvania Dep’t of Corr. v. Yeskey*, 524 U.S. 206, 210, 118 S.Ct. 1952 (1998). “Federal regulations implementing Title II require public entities to „make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless the public entity can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity.□”

7. It is plaintiffs’ claim that defendants 1-7 discriminated against plaintiff by failing to recognize the existence of her disability which would have then required special accommodations during apprehension and while imprisoned at Ewing Township police Department and Mercer County Workhouse in Lambert NJ. Therefore, as the defendants were aware of plaintiffs’ disability, but denied use of defendants programs to accommodate disabled individual, and denied the programs because of defendants disability as recognition of condition would have required providing proper guidelines to police officers of appropriate procedure or programs in place to handle disabled person, but as defendants failed to acknowledge plaintiff’s disability defendants failed to adhere to ADA Regulations.

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14. Police Officer Morris # 172, 2 Jake Garzio Drive Ewing NJ 08638, was at all times relevant to this lawsuit a police officer with the Ewing Township Police Department. The acts of Morris, which are subject of this lawsuit, were outside the scope of his employment and constituted criminal, fraudulent, willful and malicious conduct. Upon information and belief, Caldwell is a citizen of the United States and a resident of the State of New Jersey.
15. Police Officer Tettemer #175, 2 Jake Garzio Drive Ewing NJ 08638, was at all times relevant to this lawsuit a police officer with the Ewing Township Police Department. The acts of Tettemer, which are subject of this lawsuit, were outside the scope of his employment and constituted criminal, fraudulent, willful and malicious conduct. Upon information and belief, Caldwell is a citizen of the United States and a resident of the State of New Jersey.
16. The Township of Ewing, 2 Jake Garzio Drive Ewing NJ 08638, was at all times relevant to this lawsuit a governmental entity subject to suit, and was responsible for creating and implementing policies and practices that violated the federal and common law rights of the plaintiff.

FACTS

17. On or about March 5, 2010, defendants arrived at plaintiffs place of residency, 133 Buttonwood Drive Ewing NJ 08638 at time of incident in question. Defendants were accompanied by Ewing Township Health Inspector, Carol Martin, Animal Control Officer Rick Moore, and several other John and Jane Does who cannot be accounted for. Upon receiving notice by Health Inspector and defendants that she was being served with warrant to enter home and even though sister, Patricia Freeman was home she was not opening door, responding to their demands and was not letting anyone in. Plaintiff did not refuse but proceeded with walking up step to main door to open door as requested. Therefore, plaintiff conducted herself in an appropriate manner and in compliance with all laws and ordinances.

- Details :** Plaintiff has not stated nor was she aware as to whether or not parties identified in #14 arrived at same point and time or sporadically reached the identified residential destination. As Plaintiff was at residency upon parties arriving, Ms. Martin phoned plaintiff by contacting at cell phone previously provided to Ms. Martin by plaintiff. Plaintiff was informed by Ms. Martin to proceed home immediately. She was at plaintiffs' residency and had a warrant to enter home to check for a working heater. Ms. Martin stated she had received an anonymous phone call in which the individual claimed plaintiffs' sister, Patricia Freeman, was a juvenile, mentally handicapped and being left in home alone without a working heater. This was not true. Sister stuttered, was socially different from average person but not mentally handicap. She has a BA in Education and is ½ years credits away from completing her master's degree. In addition sister was not living at our house by herself. After our mother's death in March 2009 we foreclosed on the house February 2010. Fortunately, plaintiff and sister had signed a lease on a rental property in Trenton NJ and didn't want to put money into repairs at current residency. Plaintiff had initiated the first stages of she and her sisters' move, therefore, plaintiff was back and forth between both the rental and the foreclosed home. In spite of sharing this information with Health Inspector, Ms. Martin still insisted on entering home
18. The first person who approached plaintiff was Ms. Martin. AT plaintiffs request, Ms. Martin was willing to give plaintiff opportunity to phone her legal consult, an attorney who had provided advice during plaintiffs' previous issues with the Ewing Township. Just as plaintiff was about to make call, defendant #7, Police Officer Jeffrey Caldwell stepped up to plaintiff and stated "If you don't let us in three minutes we're going to burst the door in." Plaintiff said, ok and stated she

- was not going to deny them entry but didn't understand why this is all was happening and she and her sister would be moving within the month. Plaintiff first considered phoning newspaper, frustrated by what was happening but realized that particular action would not help.
19. Plaintiff walked up the three cement steps leading up to the front door of house parties were demanding to enter. That same demanding officer stretched the outer screen open door fully extended. Plaintiff took out keys and put house key to key hole, but before opening the door asked police officer Caldwell directly behind plaintiff if he would push the outer screen door in a little so that my 120 pound dog wouldn't dash after defendant opened door. The officer refused. Plaintiff began posing the question again, suddenly she felt defendant 7 grab her from behind and other defendants followed suit. Plaintiff stated everything started happening so fast.
 20. Defendants 7-11 dragged plaintiff down three cement steps of the front porch. Plaintiff could feel her head and face hit each one until my head hit the pavement of the walkway. She just screamed in terror and pain. She screamed out that I have a disability but they continued with their physical assault on me.
 21. Defendants 8-11 slid me along until I was on the grass and began hitting kicking and punching me. She couldn't move just scream but they continued. She could feel the defendants knees jabbing her in the back of her neck and back. It was so painful she stated but plaintiff was not strong enough to move at all.
 22. Then while laying face down on the grass, Plaintiff felt a strong burning in both my eyes. She had been maced. She cried out why why. She couldn't believe this was happening. Defendants attempted to stand plaintiff up but she was unable to balance so defendants held and carried plaintiff in a vertical position, put her into the police car, and slammed the door.
 23. Plaintiff tried sitting up and everything was spinning. She thought she was about to die she stated. She stated the pain in her head, face, back, and neck was excruciating. Plaintiff cried out to God to please not let her die. She had just lost her mother to cancer in March 2009 and needed to stay alive to be with my younger sister.
 24. The spinning eased up and plaintiff was able to lay back. She screamed out that she needed medical attention. Plaintiff yelled it again. Finally one of the defendants opened the door and said medical was on its way and then slammed it closed.
 25. Plaintiff stated she started crying, "Why did they do this to me? I didn't deserve this." I couldn't stop.
 26. Plaintiff was transported by ambulance to ER. Once at the emergency room two caucasian nurses cared for me. They were so disturbed by my physical condition. What did I do so bad that I deserved to be so beaten up. Scared for my safety they said plaintiff could stay in ER as long as I

wanted to. The officers watched everything plaintiff did. She stated she even over heard one of the officers who was standing guard over me say to another officer, "I tussled that one down earlier." He was referring to me. From the emergency room I was taken to Ewing Police Dept, booked and transported to Mercer County Workhouse. Plaintiff spent five days there the last four in the infirmary.

27. Plaintiff suffered physical and mental injuries as a result of the conduct of the aforementioned defendants.
28. The aforementioned plaintiff filed written complaint with Ewing Township Police Department.
29. The defendants, Township of Ewing, Mayor Jack Ball, and Ewing Township Police Department through their failure to train the police officer defendants in the proper use of force and the law of arrest, search and seizure, their failure to supervise the defendant officers, and their failure to properly train police officers on how to handle person with permanent disability during seizure which violated ADA, Township of Ewing have established a policy and custom of allowing, condoning and not prosecuting the illegal acts of the defendant police officers which resulted in violations of the rights of the plaintiffs.
30. The police officer defendants, through their direct action in assaulting, falsely arresting, holding and charging plaintiffs, violated their rights under the Fourth, Fifth, Sixth and Eighty Amendments to the United States Constitution and under the common law of the State of New Jersey.

COUNT ONE

31. The preceding paragraphs are adopted and incorporated by reference.
32. Acting under color of law and the authority of the Township of Ewing the defendant police officers intentionally and with complete and deliberate indifference for the plaintiffs' rights:
 - a. used a degree of force that was unreasonable and unwarranted under the circumstances;
 - b. effected searches, seizures and arrests without reasonable suspicion, probable cause and in the absence of exigency;
 - c. subjected the plaintiffs to punishment without the benefit of a trial;
 - d. Deprived the plaintiffs of their liberty by subjecting them to unwarranted and unreasonable restraints on their persons without due process in violation of their rights under the Fourth and Fifth Amendments.
33. Defendants Township of Ewing, Ewing Township Police department and Mayor Jack Ball, under color of law, caused the plaintiffs to be deprived of their constitutional rights including but not limited to the Fourth, Fifth, Sixth and Eighth Amendments by:

- a. failing to supervise the training and conduct of defendant police officers;
- b. failing to enforce the Constitution of the United States concerning the use of force by members of the Trenton Police Department;
- c. failing to enforce the Constitution of the United States concerning the law of arrest, search and seizure;
- d. promulgating and issuing a police manual that was violative of the plaintiffs' rights and/or was not followed by the Ewing Township Police Department, resulting in the plaintiffs' injuries.

34. The plaintiffs' injuries and deprivations of constitutional rights were caused by defendant police director's:

- a. inadequate supervision of the training and conduct of the Ewing Township Police Department;
- b. failure to enforce the plaintiffs' rights under the Fourth, Fifth, Sixth and Eighth Amendments of the Constitution of the United States;
- c. issuance of vague, confusing, and contradictory policies concerning the use of force that violated the plaintiffs' rights under the Fourth, Fifth, Sixth and Eighth Amendments of the United States Constitution.
- d. under color of law, authorized, permitted, and tolerated the custom and practice of the unconstitutional and excessive use of force by members of the Ewing Township Police Department and, in particular by defendant police officers, by failing:
 - i. to appoint, promote, train and supervise members of the Ewing Police Department to prevent the violations complained of herein;
 - ii. to ensure the fair and evenhanded application of the law;
 - iii. to protect the plaintiffs' rights pursuant to the Fourth, Fifth, Sixth and Eighth Amendments;
 - iv. to promulgate procedures and policies for the use of force and OC spray that were consistent with the Fourth, Fifth, Sixth, and Eighth Amendments of the Constitution; and
 - v. to address, investigate and eliminate the policy and custom of using unreasonable and excessive force by the Ewing Township Police Department and the police officer defendants, which failure to act thereby affirmed the deprivation of the plaintiffs' rights under the Fourth, Fifth, Sixth and Eighth Amendments; and vi. investigate the plaintiffs' complaints.

83. The plaintiffs' injuries and deprivations of constitutional rights were caused by The Township of Ewing and the Mayor's failure to implement the protections of the Fourth, Fifth, Sixth and Eighth Amendments and by their failure to properly train, supervise, and discipline the police officer defendants regarding their violations of the plaintiffs' rights in this case.

35. The City of Trenton, the Mayor, and the police director permitted and condoned a culture of lawlessness within the Ewing Township Police Department, which included the failure to investigate the plaintiffs' complaints concerning the police officer defendants. This culture of lawlessness encouraged the conduct alleged above, resulting in harm to the plaintiffs.

COUNT TWO

36. The preceding paragraphs are adopted and incorporated by reference.

37. Defendant police officers, in using unreasonable and excessive force against the plaintiffs, acted in an extreme and outrageous manner, intentionally and with reckless disregard for the plaintiffs' welfare, inflicted severe emotional distress on the plaintiffs.

COUNT THREE

38. The preceding paragraphs are adopted and incorporated by reference.

39. Defendant police officers' actions constituted aggravated assault.

40. At the time of the aggravated assault, defendant police officers were wearing their uniforms, were armed with handguns, and were acting under color of law.

41. In committing the aggravated assault against the plaintiffs, defendant police officers abused the authority granted to them by the Township of Ewing.

42. Defendant police officers caused physical and emotional injuries to the plaintiffs, and are liable to the plaintiffs for their conduct.

COUNT FOUR

43. The preceding paragraphs are adopted and incorporated by reference.

44. Defendant police officers unlawfully detained plaintiffs against their will, without probable cause. At the time of the detention, defendant police officers were in uniform, armed with handguns, and were acting under color of law.

45. Defendant police officers restrained and detained plaintiffs without reasonable suspicion and/or probable cause, and therefore falsely imprisoned them.

46. Defendant police officers caused physical and emotional injuries to the plaintiffs, and are liable to the plaintiffs for their conduct.

PRAYER FOR RELIEF

WHEREFORE, the plaintiffs pray that this Court:

A. Award the plaintiffs compensatory damages in an amount not less than \$1,000,000.00, jointly and severally against the defendants for the matters alleged in this Complaint;

47. **Pro Se Litigant**

35. The City of Trenton, the Mayor, and the police director permitted and condoned a culture of lawlessness within the Ewing Township Police Department, which included the failure to investigate the plaintiffs' complaints concerning the police officer defendants. This culture of lawlessness encouraged the conduct alleged above, resulting in harm to the plaintiffs.

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PRAYER FOR RELIEF

WHEREFORE, the plaintiffs pray that this Court:

A. Award the plaintiffs compensatory damages in an amount not less than \$1,000,000.00, jointly and severally against the defendants for the matters alleged in this Complaint;

47. **Pro Se Litigant**

B. Award punitive damages in an amount determined by the Court to be just and proper in order to deter the conduct complained of herein;

C. Award reasonable costs and attorneys fees;

D. Enjoin and restrain the defendants from their pattern, practice, custom and policy of violating the rights of the citizens of the City of Trenton; and

E. Grant such other and further relief as the Court deems just and proper.

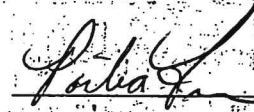
DEMAND FOR TRIAL BY JURY

The plaintiffs hereby demand a trial by jury in this action for all issues so triable.

Dated:

Portia Freeman

Pro Se Litigation

A handwritten signature in cursive script, appearing to read "Portia Freeman", written over a horizontal line.

B. Award punitive damages in an amount determined by the Court to be just and proper in order to deter the conduct complained of herein;

C. Award reasonable costs and attorneys fees;

D. Enjoin and restrain the defendants from their pattern, practice, custom and policy of violating the rights of the citizens of the City of Trenton; and

E. Grant such other and further relief as the Court deems just and proper.

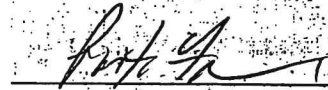
DEMAND FOR TRIAL BY JURY

The plaintiffs hereby demand a trial by jury in this action for all issues so triable.

Dated:

Portia Freeman

Pro Se Litigation

A handwritten signature in cursive script, appearing to read 'Portia Freeman', is written over a horizontal line.

RECEIVED

JS 14 (Rev. 12-07, NJ 5108)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. It is provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM)

MAR 06 2012
AT 8:31
WILLIAM T. WALSH
CLERK

I. (a) PLAINTIFFS

Portia Freeman

(b) County of Residence of First Listed Plaintiff

Mercer

(c) Attorney's (Firm Name, Address, Telephone Number and Email Address)

Pro Se Litigant

DEFENDANTS

County of Residence of First Listed Defendant

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION

(Place an "X" in One Box Only)

☐ 1 U.S. Government Plaintiff☒ Federal Question (U.S. Government Not a Party)☒ 2 U.S. Government Defendant☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Citizen of This State

☐ 1 ☐ 1

Incorporated or Principal Place of Business in This State

☐ 4 ☐ 4

Citizen of Another State

☐ 2 ☐ 2

Incorporated and Principal Place of Business in Another State

☐ 5 ☐ 5

Citizen or Subject of a Foreign Country

☐ 3 ☐ 3

Foreign Nation

☐ 6 ☐ 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
☐ 110 Insurance	☐ 310 Airplane	☐ 610 Agriculture	☐ 422 Appeal 28 USC 158	☐ 400 State Reapportionment
☐ 120 Marine	☐ 315 Airplane Product Liability	☐ 620 Other Food & Drug	☐ 423 Withdrawal 28 USC 157	☐ 410 Arbitration
☐ 130 Miller Act	☐ 320 Assault, Libel & Slander	☐ 625 Drug Related Seizure of Property 21 USC 881	PROPERTY RIGHTS	☐ 430 Banks and Banking
☐ 140 Negotiable Instrument	☐ 330 Federal Employers' Liability	☐ 630 Liquor Laws	☐ 820 Copyrights	☐ 450 Commerce
☐ 150 Recovery of Overpayment & Enforcement of Judgment	☐ 340 Marine	☐ 640 R.R. & Truck	☐ 830 Patent	☐ 460 Deportation
☐ 151 Medicare Act	☐ 345 Marine Product Liability	☐ 650 Airline Regs.	☐ 840 Trademark	☐ 470 Racketeer Influenced and Corrupt Organizations
☐ 152 Recovery of Defaulted Student Loans (Excl. Veterans)	☐ 350 Motor Vehicle	☐ 660 Occupational Safety/Health	SOCIAL SECURITY	☐ 480 Consumer Credit
☐ 153 Recovery of Overpayment of Veteran's Benefits	☐ 355 Motor Vehicle Product Liability	☐ 690 Other	☐ 861 HIA (1395ff)	☐ 490 Cable/Sat TV
☐ 160 Stockholders' Suits	☐ 360 Other Personal Injury	LABOR	☐ 862 Black Lung (923)	☐ 810 Selective Service
☐ 190 Other Contract	☐ 370 Other Fraud	☐ 710 Fair Labor Standards Act	☐ 863 DIWC/DIWW (405(g))	☐ 850 Securities/Commodities/Exchange
☐ 195 Contract Product Liability	☐ 371 Truth in Lending	☐ 720 Labor/Mgmt. Relations	☐ 864 SSID Title XVI	☐ 875 Customer Challenge 12 USC 3410
☐ 196 Franchise	☐ 380 Other Personal Property Damage	☐ 730 Labor/Mgmt. Reporting & Disclosure Act	☐ 865 RSI (405(a))	☐ 890 Other Statutory Actions
	☐ 385 Property Damage Product Liability	☐ 740 Railway Labor Act	FEDERAL TAX SUITS	☐ 891 Agricultural Acts
REAL PROPERTY	CIVIL RIGHTS	☐ 790 Other Labor Litigation	☐ 870 Taxes (U.S. Plaintiff or Defendant)	☐ 892 Economic Stabilization Act
☐ 210 Land Condemnation	☐ 441 Voting	☐ 791 Empl. Ret. Inc. Security Act	☐ 871 IRS—Third Party 26 USC 7609	☐ 893 Environmental Matters
☐ 220 Foreclosure	☐ 442 Employment	IMMIGRATION		☐ 894 Energy Allocation Act
☐ 230 Rent Lease & Ejectment	☐ 443 Housing/Accommodations	☐ 462 Naturalization Application		☐ 895 Freedom of Information Act
☐ 240 Torts to Land	☐ 444 Welfare	☐ 463 Habeas Corpus - Alien Detainee		☐ 900 Appeal of Fee Determination Under Equal Access to Justice
☐ 245 Tort Product Liability	☐ 445 Amer. w/Disabilities - Employment	☐ 463 Habeas Corpus - Prison Condition		☐ 950 Constitutionality of State Statutes
☐ 290 All Other Real Property	☒ 446 Amer. w/Disabilities - Other			
	☒ 440 Other Civil Rights			

V. ORIGIN

(Place an "X" in One Box Only)

☒ Original Proceeding☐ 2 Removed from State Court☐ 3 Remanded from Appellate Court☐ 4 Reinstated or Reopened☐ 5 Transferred from another district (specify)☐ 6 Multidistrict Litigation☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

1983, 1331, 1332, 1343, fourth, fifth, sixth, eyes

Brief description of cause:

Excessive force on disabled citizen

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMANDS

No less than \$1,000.00

(CHECK YES only if demanded in complaint: JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S)

(See instructions):

JUDGE

DOCKET NUMBER

Explanation:

3/5/12

DATE

SIGNATURE OF ATTORNEY OF RECORD

AO 239 (01/09) Application to Proceed in District Court Without Prepaying Fees or Costs (Long Form)

UNITED STATES DISTRICT COURT

for the

Portia Freeman
 Plaintiff/Petitioner
Ewing Tap Police v. Dept. See attachment
 Defendant/Respondent

Civil Action No.

APPLICATION TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING FEES OR COSTS
 (Long Form)

Affidavit in Support of the Application

Instructions

I am a plaintiff or petitioner in this case and declare that I am unable to pay the costs of these proceedings and that I am entitled to the relief requested. I declare under penalty of perjury that the information below is true and understand that a false statement may result in a dismissal of my claims.

Complete all questions in this application and then sign it. Do not leave any blanks: if the answer to a question is "0," "none," or "not applicable (N/A)," write that response. If you need more space to answer a question or to explain your answer, attach a separate sheet of paper identified with your name, your case's docket number, and the question number.

Signed: Portia FreemanDate: 3/5/12

1. For both you and your spouse estimate the average amount of money received from each of the following sources during the past 12 months. Adjust any amount that was received weekly, biweekly, quarterly, semiannually, or annually to show the monthly rate. Use gross amounts, that is, amounts before any deductions for taxes or otherwise.

Income source	Average monthly income amount during the past 12 months		Income amount expected next month	
	You	Spouse	You	Spouse
Employment	\$ 0	\$	\$ 0	\$
Self-employment	\$ 0	\$	\$ 0	\$
Income from real property (such as rental income)	\$ 0	\$	\$ 0	\$
Interest and dividends	\$ 0	\$	\$ 0	\$
Gifts	\$ 0	\$	\$ 0	\$
Alimony	\$ 0	\$	\$ 0	\$
Child support	\$ 0	\$	\$ 0	\$

AO 239 (01/09) Application to Proceed in District Court Without Prepaying Fees or Costs (Long Form)

Retirement (such as social security, pensions, annuities, insurance)	\$ 0	\$ /	\$ 0	\$ /
Disability (such as social security, insurance payments)	\$ 1324	\$ /	\$ 1324	\$ /
Unemployment payments	\$ 0	\$ /	\$ 0	\$ /
Public-assistance (such as welfare)	\$ 0	\$ /	\$ 0	\$ /
Other (specify):	\$ 0	\$ /	\$ 0	\$ /
Total monthly income:	\$ 1324 0.00	\$ / 0.00	\$ 1324 0.00	\$ / 0.00

2. List your employment history for the past two years, most recent employer first. (Gross monthly pay is before taxes or other deductions.) *Not Employed for past two years*

Employer	Address	Dates of employment	Gross monthly pay
			\$
			\$

3. List your spouse's employment history for the past two years, most recent employer first. (Gross monthly pay is before taxes or other deductions.) *Not Married.*

Employer	Address	Dates of employment	Gross monthly pay
			\$
			\$
			\$

4. How much cash do you and your spouse have? \$ single

Below, state any money you or your spouse have in bank accounts or in any other financial institution.

Financial institution	Type of account	Amount you have	Amount your spouse has
Chase Bank	Checking	\$ 0	\$ NA
		\$	\$
		\$	\$

*Direct Deposit
each month
Social
Security
Disability
Check*

If you are a prisoner, you must attach a statement certified by the appropriate institutional officer showing all receipts, expenditures, and balances during the last six months in your institutional accounts. If you have multiple accounts, perhaps because you have been in multiple institutions, attach one certified statement of each account.

AO 239 (01/09) Application to Proceed in District Court Without Prepaying Fees or Costs (Long Form)

5. List the assets, and their values, which you own or your spouse owns. Do not list clothing and ordinary household furnishings.

Assets owned by you or your spouse		
Home (Value)		\$ 0
Other real estate (Value)		\$ 0
Motor vehicle #1 (Value)		\$ 0
Make and year:		
Model:		
Registration #:		
Motor vehicle #2 (Value)		\$ 0
Make and year:		
Model:		
Registration #:		
Other assets (Value)		\$ 0
Other assets (Value)		\$ 0

6. State every person, business, or organization owing you or your spouse money, and the amount owed.

Person owing you or your spouse money	Amount owed to you	Amount owed to your spouse
None	\$ 0	Not applicable
	\$ 0	\$
	\$ 0	\$

7. State the persons who rely on you or your spouse for support.

Name (or, if under 18, initials only)	Relationship	Age
Patricia Freeman,	Sister	42

AO 239 (01/09) Application to Proceed in District Court Without Prepaying Fees or Costs (Long Form)

8. Estimate the average monthly expenses of you and your family. Show separately the amounts paid by your spouse. Adjust any payments that are made weekly, biweekly, quarterly, semiannually, or annually to show the monthly rate.

	You	Your spouse
Rent or home-mortgage payment (including lot rented for mobile home) Are real estate taxes included? ☐ Yes ☒ No Is property insurance included? ☐ Yes ☒ No	\$	\$
Utilities (electricity, heating fuel, water, sewer, and telephone)	\$ 400	\$
Home maintenance (repairs and upkeep)	\$ 150	\$
Food	\$ 300	\$
Clothing	\$ 100	\$
Laundry and dry-cleaning	\$ 50	\$
Medical and dental expenses	\$ 50	\$
Transportation (not including motor vehicle payments)	\$ 100	\$
Recreation, entertainment, newspapers, magazines, etc.	\$ 30	\$
Insurance (not deducted from wages or included in mortgage payments)	0	
Homeowner's or renter's:	\$ 0	\$
Life:	\$ 0	\$
Health:	\$ 0	\$
Motor vehicle:	\$ 0	\$
Other:	\$ 0	\$
Taxes (not deducted from wages or included in mortgage payments) (specify):	\$ 0	\$
Installment payments		
Motor vehicle:	\$ 0	\$
Credit card (name):	\$ 25	\$
Department store (name):	\$ 0	\$
Other: cell phone	\$ 50 w	\$
Alimony, maintenance, and support paid to others	\$ 0	\$

AO 239 (01/09) Application to Proceed in District Court Without Prepaying Fees or Costs (Long Form)

Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ 0	\$
Other (specify):	\$ 0	\$
Total monthly expenses:	\$ 12.55 0.00	\$ 0.00

9. Do you expect any major changes to your monthly income or expenses or in your assets or liabilities during the next 12 months?

☐ Yes ☒ No If yes, describe on an attached sheet.

10. Have you paid — or will you be paying — an attorney any money for services in connection with this case, including the completion of this form? ☐ Yes ☒ No

If yes, how much? \$ _____

If yes, state the attorney's name, address, and telephone number:

11. Have you paid — or will you be paying — anyone other than an attorney (such as a paralegal or a typist) any money for services in connection with this case, including the completion of this form? ☐ Yes ☒ No

If yes, how much? \$ _____

If yes, state the person's name, address, and telephone number:

12. Provide any other information that will help explain why you cannot pay the costs of these proceedings.

Income limited solely to social security disability

13. Identify the city and state of your legal residence. *Thernton New Jersey*

Your daytime phone number: *609-369-4378*

Your age: *43* Your years of schooling: *16*

Last four digits of your social-security number: *8444*

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

Portia Freeman

Plaintiff,

v.

**ORDER ON APPLICATION
TO PROCEED WITHOUT
PREPAYMENT OF FEES**

Case Number: 12-1366 PGS/DEA

**Ewing Township Police Dept., et.al.
Defendants.**

Having considered the application to proceed without prepayment of fees under 28 U.S.C. § 1915;

IT IS ORDERED that the application is:

☐ **GRANTED, and**

☐ **The Clerk is directed to file the complaint, and**

☐ **IT IS FURTHER ORDERED that the clerk issue summons and the United States Marshal serve a copy of the complaint, summons and this order upon the defendant(s) as directed by the plaintiff. All costs of service shall be advanced by the United States.**

☐ **DENIED, for the following reasons:**

☐ **and the Clerk is directed to close the file.**

Plaintiff may submit a filing fee of \$350.00 within 30 days from the date of this order to reopen this case.

ENTERED this _____ day of _____, 2012

Judge Peter G. Sheridan, U.S.D.J.

Form A

RECEIVED

MAR 11 2019

SUPERIOR COURT OF NJ
MERCER VICINAGE
CIVIL DIVISION

Plaintiff or Filing Attorney Information:

Name Garla Freeman

NJ Attorney ID Number _____

Address 125 Tyler Street

Trenton, NJ 08609

Telephone Number (609) 775-3210

Garla Freeman,
Plaintiff,

v.

Trenton Police,
Defendant(s).

Superior Court of New Jersey

Division Mercer County

Civil Part

Docket No. 8-515-19
(to be filled in by the court)

Civil Action

Complaint

Plaintiff, Garla Freeman, residing at
(your name)
125 Tyler Street, City of Trenton
(your address) (your city or town)
County of Mercer
(your county)

State Of New Jersey, complaining of defendant, states as follows:

1. On January 11th, 2019, Trenton Police, Defendant
(name of person being sued)
(Summarize what happened that resulted in your claim against the defendant. Use additional pages if necessary.)

Attached pages to read

The defendant in this action resides at 225 North Clinton Ave, Trenton, NJ 08608
(defendant's address)
In the County of Mercer, State of New Jersey.
(name of county where defendant lives)

2. Plaintiff is entitled to relief from defendant under the above facts.

Form A

3. The harm that occurred as a result of defendant's acts include: (list each item of damage and injury)

1. I have developed a series of medical illnesses and mental interruptions.
2. My vehicles have been stolen and damaged by the Trenton Police.
3. _____

Wherefore, plaintiff requests judgment against defendant for damages, together with attorney's fees, if applicable, costs of suit, and any other relief as the court may deem proper.

Dated: 01/07/2019 Signature: Paula Freeman

CERTIFICATION OF NO OTHER ACTIONS

I certify that the dispute about which I am suing is not the subject of any other action pending in any other court or a pending arbitration proceeding to the best of my knowledge and belief. Also, to the best of my knowledge and belief no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this complaint, I know of no other parties that should be made a part of this lawsuit. In addition, I recognize my continuing obligation to file and serve on all parties and the court an amended certification if there is a change in the facts stated in this original certification.

Dated: 01/07/2019 Signature: Paula Freeman

OPTIONAL: If you would like to have a judge decide your case, do not include the following paragraph in your complaint. If you would prefer to have a jury to decide your case, please sign your name after the following paragraph.

JURY DEMAND

The plaintiff demands trial by a jury on all of the triable issues of this complaint, pursuant to New Jersey Court Rules 1:8-2(b) and 4:35-1(a).

Dated: 01/07/2019 Signature: Paula Freeman

Appendix XII-B1

	CIVIL CASE INFORMATION STATEMENT (CIS)		FOR USE BY CLERK'S OFFICE ONLY		
	Use for initial Law Division Civil Part pleadings (not motions) under <i>Rule 4:5-1</i> Pleading will be rejected for filing, under <i>Rule 1:5-6(c)</i>, if information above the black bar is not completed or attorney's signature is not affixed		PAYMENT TYPE: ☐ CK ☐ CG ☐ CA CHG/CK NO. _____ AMOUNT: _____ OVERPAYMENT: _____ BATCH NUMBER: _____		
	ATTORNEY / PRO SE NAME <i>Garla Renee Freeman</i>	TELEPHONE NUMBER <i>(609) 775-3210</i>	COUNTY OF VENUE <i>Mercer</i>		
	FIRM NAME (if applicable) _____		DOCKET NUMBER (when available) <i>8-575-19</i>		
OFFICE ADDRESS <i>125 Tyler Street Trenton, NJ 08609-2538</i>		DOCUMENT TYPE <i>Complaint</i> JURY DEMAND ☒ YES ☐ NO			
NAME OF PARTY (e.g., John Doe, Plaintiff) <i>Garla Freeman, Plaintiff</i>		CAPTION <i>Garla Freeman, Plaintiff v. Trenton Police Defendant</i>			
CASE TYPE NUMBER (See reverse side for listing) <i>605</i>	HURRICANE SANDY RELATED? ☒ YES ☐ NO	IS THIS A PROFESSIONAL MALPRACTICE CASE? ☐ YES ☒ NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A-27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.			
RELATED CASES PENDING? ☐ YES ☒ NO		IF YES, LIST DOCKET NUMBERS _____			
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? ☒ YES ☐ NO		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) ☐ NONE ☒ UNKNOWN			
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.					
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION					
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? ☒ YES ☒ NO		IF YES, IS THAT RELATIONSHIP: ☐ EMPLOYER/EMPLOYEE ☐ FRIEND/NEIGHBOR ☒ OTHER (explain) ☐ FAMILIAL ☐ BUSINESS <i>N/A</i>			
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? ☐ YES ☐ NO					
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION <i>My case involves a few areas that may include discussion of civil rights, personal injury and defamation of character. My case involves a variation of topics. The case may even include case #618.</i>					
☒ DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? ☒ YES ☐ NO		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION: <i>I have nerve damage and bodily pain.</i>			
WILL AN INTERPRETER BE NEEDED? ☐ YES ☒ NO		IF YES, FOR WHAT LANGUAGE? <i>I also have difficulty hearing.</i>			
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with <i>Rule 1:38-7(b)</i> .					
ATTORNEY SIGNATURE: <i>Garla Freeman</i>					

Garla Freeman

125 Tyler Street, Trenton, NJ 08609 | 609-775-3210 | garlarenee2016@yahoo.com

January 23, 2018

Superior Court
R.J. Hughes Justice Complex
Superior Court Clerk's Office
P.O. Box 971
Trenton, NJ 08625-0971

To whom it may concern

I called a representative over the phone and they told me to pick one case type number. However, I believe that my case involves several case type number(s). My case may have several different case type numbers. The case type numbers for my case could may include numbers: 609, 610, 999,005,509,620, 618, 605 and 602. I am very saddened and heartbroken that I have had to deal with this kind of cruelty. Please direct me towards the correct case type number.

Sincerely,

Garla Freeman
garlarenee2016@yahoo.com
609-775-3210

Garla Freeman

125 Tyler Street

Trenton, NJ 08609-2538

Defendants – Superior Court

The main defendants, in this case, are the Trenton Police, and I anticipate on starting a lawsuit, for the amount of \$666,000. If I am able to sue, only one company, at this time, it is going to be the Trenton Police. I have been harassed nonstop. I am also going to sue Hawk's Towing and Risoldi's Towing for \$25,000 each, because they work, in accordance, with the Trenton Police and they have ruined my vehicles. Furthermore, I plan to sue, the Hamilton Police, in the amount of \$250,000. They falsely accused me of a crime that I did not commit and administered unnecessary photos and fingerprints. These are my first photos and prints ever. The Mercer County Sheriff's Office has also exacerbated my illness, causing more pain and anguish and I would also like to sue them for \$50,000. They have contributed to further mayhem. The last company to get indicted, is the Ewing, Police of Mercer County, NJ, they have also contributed to further destruction of my life (career, health, success, and wealth). I hope to bring a claim against them for the amount of \$25,000. Overall, I am optimistic about beginning a claim for the amount of up to \$1, 016,000.

Trenton Municipal Court- Main Defendants

225 North Clinton Avenue

Trenton, NJ 08609

Hamilton Municipal Court- Additional Defendants

1270 Whitehorse Mercerville Road, Suite 2

Hamilton, NJ 08619

Hawk's Towing – Additional Defendants

401 New York Avenue

Trenton, NJ 08638

Risoldi's Towing-Additional Defendants

39 Murihead Ave

Trenton, NJ 08638

Ewing Municipal Court-Additional Defendants

2 Jake Garzio Dr.

Ewing, NJ 08628

Sheriff's Office – Mercer County, NJ- Additional Defendants

175 South Broad Street

Trenton, NJ 08608

Garla Freeman
125 Tyler Street
Trenton, NJ 08609-2538
Garlarenee2016@yahoo.com
(609) 775-3210

Superior Court
R.J. Hughes Justice Complex
Superior Court Clerk's Office
P.O. Box 971
Trenton, NJ 08625-0971

To whom it may concern:

I have dealt with several forms of discrimination, personal injury, defamation and harassment from the Trenton Police. However, I have had the Ewing Police in Ewing, NJ and the Hamilton Police of Hamilton, NJ harass me on a few occasions (2017-2018). I was followed and given two traffic tickets that I believe were from racial and color profiling. I am a typical Black woman, and they like to stop me while I had my vehicles (2009-2018). In my recent report, they have even knocked on my door (2018). I could not afford a lawyer so I accepted their plead deal in court. I was very innocent, however, I think, when they looked at my previous records(dismissed) that were expunged, it showed three previous reports and each new officer gives me more tickets. This could ruin my life. I am planning to relocate to a much safer state where the crime statistics are lower and the police officers are more trained. I would like to explain how these previous false reports(defamed) from the Trenton Police in NJ are causing other officers to confabulate reports. Due to their stalking, defamation and harassment, while I was

disabled, I am homeless, in pain, living in the inner city streets and currently unemployed. I hope to sue this municipal for many reasons.

God Bless,

Garla Freeman

Garla Renee Freeman

125 Tyler Street, Trenton, NJ 08609 | 609-775-3210 | garlarenee2016@yahoo.com

January 22, 2019

Mary C. Jacobson
R.J. Hughes Justice Complex
Superior Court Clerk's Office
P.O. Box 971
Trenton, NJ 08625-0971

*This was
Revised / edited.
Garla*

Dear Jacobson:

I am writing a complaint in reference to heart and bodily damage(various), continued defamation/slander(2001- 2019), stalking/harassment (2009-2019), damage to property(three vehicles(2009-2018), pain and suffering(2001-2019), depression(2001-2019), bodily injury(hernia, ankle)(2009-2019),verbal/physical assault(2009-2019) and GAD(2009-2019), caused by the officials and police officers at the Trenton Police Department towards me. I have suffered from several forms of defamation and injury since 2001- to present. I have a list of problems caused by the Trenton Police Department that I am going present to this court. I believe that the malicious actions of the police towards me is leading into premediated murder towards me. I am a law abiding citizen and I plan to further my education. The corruptions at the Trenton Police are scaring me to the point that I may get killed by one of them. I have been defamed since 2001 and they continue to confabulate reports about me for no reason. Please have someone investigate the Trenton Police.

Overall, I am trying to seek compensation from the Trenton Police Department due to each of the problems listed in this letter. I may have others to add to the case. I am on the brink of homelessness and I would like to obtain employment like every other law citizen in the United States. There are several track numbers that this case could be assigned. Please send me correspondence on how to deal with the problems of the administration and police at Trenton, NJ.

Sincerely,

Garla Freeman
609-775-3210
garlarenee2016@yahoo.com

Garla Freeman

January 22, 2019

Mary C. Jacobson
R.J. Hughes Justice Complex
Superior Court Clerk's Office
P.O. Box 971
Trenton, NJ 08625--971

Contact

125 Tyler Street, Trenton, NJ
08609-2538
609-775-3210
Garlarenee2016@yahoo.com

Dear Jacobson,

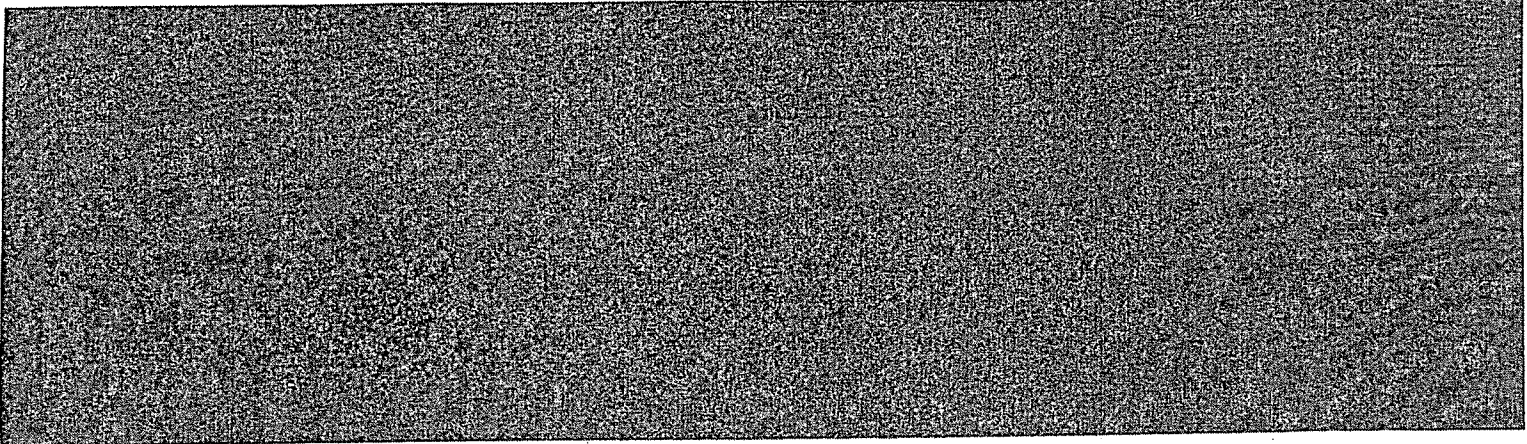
I am writing a complaint in reference to heart and bodily damage (various), continued defamation and slander towards me from 2001-2019. The police and authorities of Mercer County are becoming bothersome. I have been receiving false reporting, stalking and harassment from the police from 2009-2019, there has been false accusations/reports and harassment by the police and administrative staff of Trenton, NJ Municipal from 2001-2019.

Three vehicles have also been ruined by the Trenton Police through unlawful towing procedures from 2009-2019. I have had money and possessions stolen from three vehicles as well. The vehicles were a Hyundai Tiburon (2000), Mercedes Benz C-300(2012) and an Infiniti (G37). Due to their repeated stalking, I have lost all of my vehicles. I have also received false reports, harassment and stalking by the municipals of the Mercer County' Sheriff's Office, the administrative staff and police of Ewing, NJ and the police of Hamilton, NJ Municipal from 2018-2019.

I have developed severe pain, suffering, emotional distress and severe depression from the municipals of Trenton, NJ from 2001-2019, the police of Hamilton NJ (2018-2019), the sheriff's office of Mercer County (2018) and the police of Ewing, NJ from (2018-2019). The police of Hamilton, NJ, the Sheriff's Office and Ewing,

NJ are recently beginning to follow me for no apparent reason. It is making me very ill.

Moreover, I have two deadly and exacerbated bodily injuries caused by the municipals of Trenton, NJ and you personally. They



police of Ewing, NJ, the sheriff's office and Hamilton Police of NJ. The Municipals of Trenton, NJ, Hamilton, NJ, the sheriff's office of Mercer County, and Ewing, NJ have caused me to develop and aggravate, a severe strangulated hernia, asthmatic occurrences, ankle discomfort and other pains that are life threatening. They have also given me false and unwanted tickets causing me to lose or operate my vehicles.

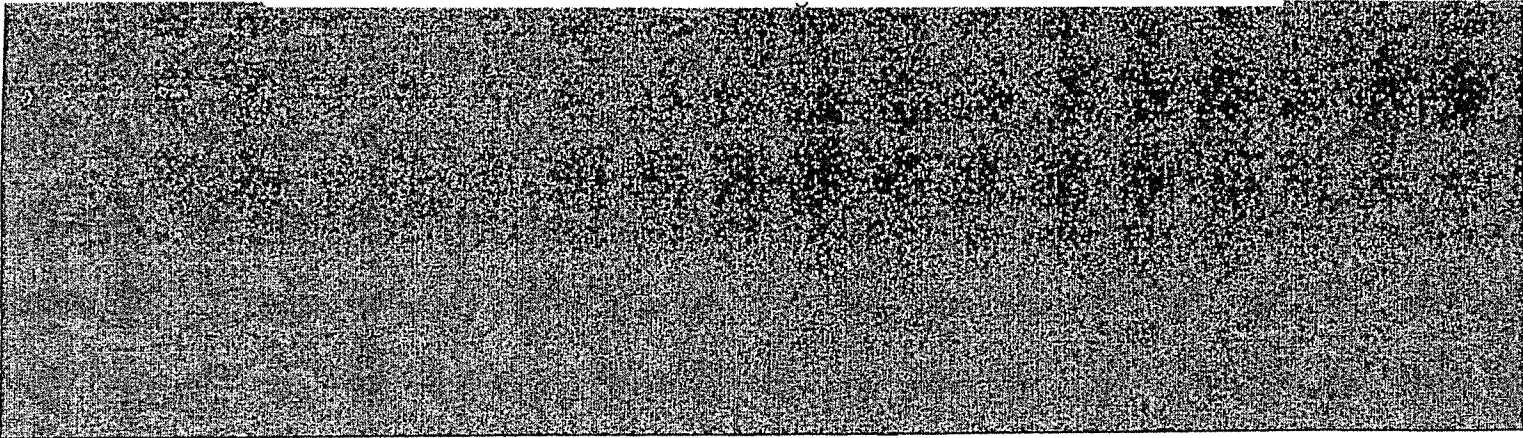
The police of Mercer County recognize individuals, who are hacking my phone, and they are associated or related to them. The police are continuing to harass me because their relatives or associates are jealous of me for some reason. These phone tricks have forced me into dangerous situations, when I was timid, causing me to further injure my ankle, stomach and other areas of my body. The municipals and police officers of Hamilton Police have even prevented me from utilizing health products and stores that may help me with some of my physical ailments and pain.

I am also going to sue for verbal and physical assault by the Trenton Police from 2009- 2019. I have also developed Generalized Anxiety Disorder from the Trenton Police, in NJ, from 2009-2019 and the Ewing Police, Ewing, NJ, sheriff's office and the Hamilton Police of Hamilton, NJ from 2018-2019. These municipals like to write up false reports and accusations because of my skin color, hair color, body and appearance and the fact that I am disabled. They are bullying me.

Basically, I have suffered from severe forms of false accusations/reports, defamation and injury since 2001- to present. I have a list of problems that I am going to present to superior court. I believe that the malicious actions of the police towards me is leading into premeditated murder towards me. These individuals may also have relatives or associates working in the locations where I shop and live. I fear that I may get killed. My life is getting worse and this occurrence should not happen since I am a very

educated and ethical woman. I am a law abiding citizen and I plan to further my education.

The corporations at the Trenton Police Department, Ewing Police, Mercer County Sheriff's Office and the Hamilton Police, as well as



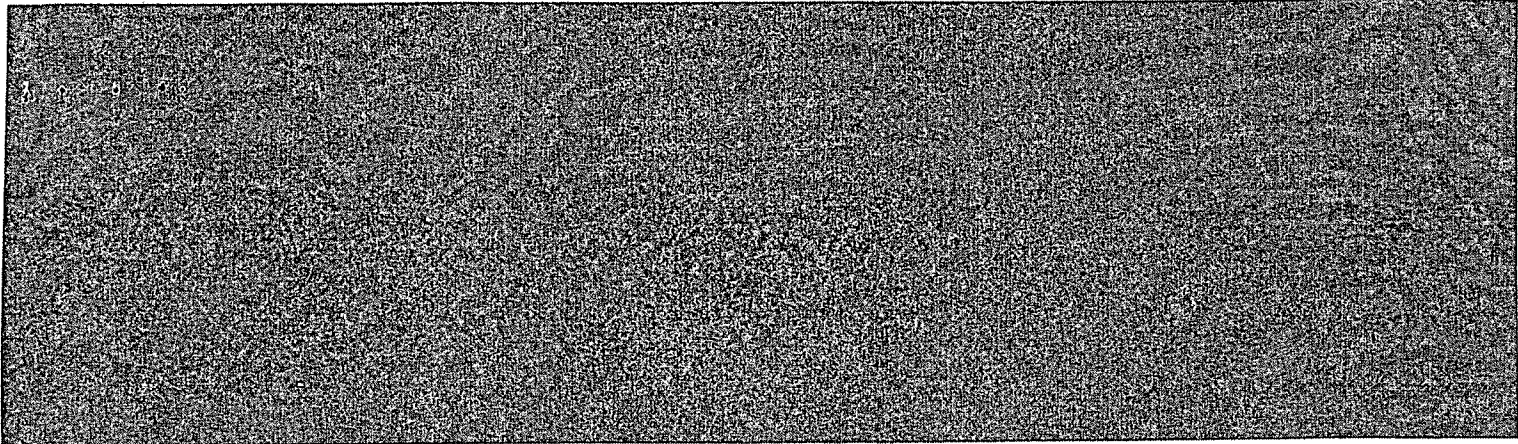
others, now and in the future, are scaring me to the point that I may get killed. I have been defamed since 2001 and they continue to confabulate reports about me for no reason. Please have someone investigate the mental and physical competence of some of these officers and personnel in Mercer County, NJ. I must have an appearance that causes a lot of men (police officers) to harass me. When I do not succumb or conjure them, they write false reports; especially when they are not able to receive sexual favors or attention. My advancement, in life, is limited from these tragic situations and I need assistance with the help of the government.

Overall, I am trying to seek compensation, in the amount, of \$666,000, from the Trenton Police Department due to each of the problems listed in this letter. I am also seeking compensation, in the amount of \$250,000, from the police of Hamilton, NJ for continued phone hacking of them or their associates, faulty and dirty finger printing and other devious false reports without evidence. The municipals are putting my life in risk of getting beaten or killed in the city of Trenton, NJ while doing errands.

I am also going to sue the municipal of Hamilton Police for false allegations and for allowing their relatives to hack my personal information or bank accounts. I may have other complaints to add to the case. Lastly, I am going to sue the municipals of Ewing, NJ for \$50,000 and the Sheriff's Office for \$50,000, for false accusations, worsening of my bodily injuries and for chasing me through Ewing, NJ while disabled and depressed. I risk getting killed and this has negatively impacted my life. The full amount equals \$1,016,000.

I am, basically, homeless and I would like to obtain employment like every other law abiding citizen in the United States. There are several track numbers that this case could be assigned. Please send me correspondence on how to deal with some of the problems of

the administration staff at the police of Trenton, NJ, Ewing Police, the Mercer County Sheriff's Office and the police of Hamilton, NJ. This is a continued repeated occurrence that I would like to stop.



Sincerely,
Garla Freeman

